Statement of Basis of the Federal Operating Permit

Braskem America, Inc.

Site/Area Name: Seadrift PP Facility
Physical location: 7501 State Highway 185 North
Nearest City: Seadrift
County: Calhoun

Permit Number: O2025
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2869
SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;
A basis for applying permit shields;
A list of the federal regulatory applicability determinations;
A table listing the determination of applicable requirements;
A list of the New Source Review Requirements;
The rationale for periodic monitoring methods selected;
The rationale for compliance assurance methods selected;
A compliance status; and
A list of available unit attribute forms.

Prepared on: October 22, 2013

Operating Permit
Basis of Determination

Permit Area Process Description

The Polypropylene Unit produces polypropylene resin in a pelletized form. The key materials used in this unit are: nitrogen, propylene, reaction & pelletizing additives, ethylene, hydrogen and butene. Natural gas is used as fuel, and airborne wastes are: PM_{10}, VOC, CO, NO_X SO_2, and hexane (HAP).

The production unit involves several operations that occur in series: Raw Materials Preparation, Polymerization, Product Finishing, Product Storage, and Material Recovery. The overall fugitive emissions from the Polypropylene unit are primarily VOC and hexane. Product Finishing, Material Recovery, and fugitive sources within these operations are subject to 40 CFR 60, Subpart DDD. Compliance with certain sections of Subpart VV is indirectly required for fugitive sources subject to Subpart DDD.

Raw Materials Preparation (PRORMPREP)
Nitrogen is supplied to the unit via pipeline, and first purified before use. A waste gas stream containing small quantities of VOC is an output of the purification system. Propylene is also supplied via pipeline and it is first degassed and moisture is removed in the Propylene Dryers. Waste gases from nitrogen purification, degassing, and the dryers are routed to the Polypropylene Flare. There are also a Catalyst Slurry Tank and Additive Feed Pots that vent VOC to the atmosphere. The Raw Materials Preparation process is exempt from Subpart DDD because its date of construction is out of the range of rule applicability.

Polymerization Reaction (PROREACTN)
There are two reaction systems No.1 and No. 2 and operate in parallel. Each system includes a reactor, a compressor, heat exchange equipment, and a product discharge system. Reaction feed materials, from the Raw Materials operation, are fed directly to both reaction systems. Other reaction feed materials include ethylene via pipeline, hydrogen from cylinders, and recovered materials from the Material Recovery operation. Each reaction system converts the raw materials to polypropylene resin. The resin from both systems is transferred to the Product Finishing process. Unreacted gaseous streams from both systems are routed to the Materials Recovery Process for re-use. Waste gas vent streams from both reaction systems are routed the Polypropylene Flare.

Product Finishing (PROFINISH)
Gases and polypropylene resin from the reactors are transferred to the Product Receiver/ Filter where the resin is trapped by a filter. The gases pass through the filter and are routed to the Materials Recovery Process. Filtered resin is fed to the Product Purging equipment. During purging, nitrogen gas and steam are passed through the polymer bed to purge out any non-polymer materials. The primary vent stream from this purging operation is routed to the flare. A minor stream, containing PM_{10} and trace amounts of VOC, is routed to a filter before venting to the atmosphere. Some of the purged resin is routed to the Mastermix Blenders in which solid additives are distributed onto the resin. The Mixer Feed Hopper/ Filter receives resin from the Mastermix and directly from the Product Purge Bin. The Liquid Additives tank feeds to the Mixer Feed Hopper at this point. And finally the polymer resin is fed to the Extruder/ Pelletizer System where it is melted, mixed, and extruded into pellets. The pellets exit the pelleter via a water/pellet mixture. The pellets are separated from the water and air-dried in the Pellet Dryer, and the water is recycled back to the Extruder/ Pelletizer. The air stream used for drying the pellets is vented to the atmosphere, and it contains PM10 and VOC. The dried pellets are transferred to the Product Storage Process.

Product Storage (PROSTORE)
Polypropylene pellets from PROFINISH are transferred into Storage/ Blending Silos which share a common vent (#344). PM10, VOC, and hexane are emitted through this filtered vent before it is discharged to the atmosphere. After storage the pellets are transferred and loaded into railcars by a series of loading systems. The rail cars carry the pellets off-site for distribution.

Material Recovery (PRORECVRY)
Gaseous streams from PROREACTN are routed to some initial recovery stages which include coolers, compressors, and condensers. Gases and liquids are routed to the Refrigeration Interchanger and the Recovery Column Condenser. These units separate the materials which can be reused from those which cannot be reused. Waste gas streams are routed to the flare.

FOPs at Site
The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants
The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, PM, NOX, HAPS, CO

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
    - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
    - Additional Monitoring Requirements
    - New Source Review Authorization Requirements
    - Compliance Requirements
    - Protection of Stratosphere Ozone
    - Permit Location
    - Permit Shield (30 TAC § 122.148)
- Attachments
    - Applicable Requirements Summary
        - Unit Summary
        - Applicable Requirements Summary
    - Additional Monitoring Requirements
    - Permit Shield
    - New Source Review Authorization References
    - Compliance Plan

    - Alternative Requirements
- Appendix A
    - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain

applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due

to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the “Permit Shield” attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility
When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
580	30 TAC Chapter 111, Visible Emissions	R1111	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions.
580	40 CFR Part 60, Subpart A	AIR ASST	SUBJECT TO 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. ADHERING TO HEAT CONTENT SPECIFICATIONS = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). FLARE ASSIST TYPE [NSPS A, NESHAP A, AND/OR MACT A] = Air-assisted
580	40 CFR Part 60, Subpart A	NO ASST	SUBJECT TO 40 CFR 60.18 = Flare is subject to 40 CFR § 60.18. ADHERING TO HEAT CONTENT SPECIFICATIONS = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). FLARE ASSIST TYPE [NSPS A, NESHAP A, AND/OR MACT A] = Non-assisted FLARE EXIT VELOCITY [NSPS A, NESHAP A, AND/OR MACT A] = Flare exit velocity is greater than or equal to 60 ft/s (18.3 m/sec) but less than 400 ft/s (122 m/sec). HEATING VALUE OF GAS [NSPS A, NESHAP A, AND/OR MACT A] = Heating value is less than or equal to 1000 Btu/scf (37.3 MJ/scm).
578	40 CFR Part 60, Subpart DDD	60DDD-12	FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS DDD] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. FLARE = USING A FLARE FOR CONTROL MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS DDD] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE [NSPS DDD] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. PUMPS IN LIGHT LIQUID SERVICE [NSPS DDD] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS DDD] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. VAPOR RECOVERY SYSTEM = NOT USING A VAPOR RECOVERY SYSTEM FOR CONTROL CONTINUOUS PROCESS [NSPS DDD] = THE AFFECTED FACILITY IS A CONTINUOUS PROCESS EEL = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES AND OTHER CONNECTORS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--OPEN-ENDED VALVES OR LINES [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--VALVES GAS/VAPOR, LIGHT LIQUID SVC [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). 40 CFR 60 (NSPS) SUBPART DDD CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 10, 1989

Unit ID	Regulation	Index Number	Basis of Determination*
			COMPLYING WITH § 60.482-2 = YES COMPLYING WITH § 60.482-6 = YES COMPLYING WITH § 60.482-7 = YES COMPLYING WITH § 60.482-8 = YES COMPLYING WITH §60.482-10 = YES 40 CFR 60 (NSPS) SUBPART DDD DESIGN CAPACITY = FACILITY HAS DESIGN CAPACITY TO PRODUCE GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR CLOSED VENT SYSTEMS AND CONTROL DEVICES (ANY SERVICE) [NSPS DDD] = CLOSED VENT SYSTEM AND CONTROL DEVICES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. COMPLYING WITH § 60.482-8 = YES COMPRESSORS (ANY SERVICE) [NSPS DDD] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. PUMPS IN HEAVY LIQUID SERVICE [NSPS DDD] = NO PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. VALVES IN HEAVY LIQUID SERVICE [NSPS DDD] = NO VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. ENCLOSED COMBUSTION DEV. = NOT USING AN ENCLOSED COMBUSTION DEVICE FOR CONTROL EQUIPMENT IN VACUUM SERVICE = NO EQUIVALENT EMISSION LIMITATION (EEL)-[NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--COMPRESSORS [NSPS DDD] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS DDD] = NO SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART DDD INCLUDED IN THE FUGITIVE UNIT. COMPLYING WITH § 60.482-3 = YES COMPLYING WITH §60.482-10 = YES
578	40 CFR Part 60, Subpart VV	60VV-01	PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = DOES NOT PRODUCE ANY CHEMICAL LISTED IN 40 CFR 60.489 AS INTERMEDIATE OR FINAL PRODUCT
1011	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
1019	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.

Unit ID	Regulation	Index Number	Basis of Determination*
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).
1020	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).
1034	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
1087	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
344	30 TAC Chapter 115, Vent Gas Controls	R5121	Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. VOC Concentration = VOC concentration is less than 30,000 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.

Unit ID	Regulation	Index Number	Basis of Determination*
573	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. VOC Concentration = VOC concentration is less than 30,000 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
574	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. VOC Concentration = VOC concentration is less than 30,000 ppmv. VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
575	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
576	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.

Unit ID	Regulation	Index Number	Basis of Determination*
577	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg). VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.
580 VENT	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Vent gas steam emissions of the specific VOCs ethylene, butadiene, isobutylene, styrene, isoprene, propylene, and/or methylstyrene. Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg).
OP-20	40 CFR Part 63, Subpart FFFF	63FFFF	Emission Standard = The vent stream is Group 2 (not designated as Group 1 and determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device.
PROFINISH	40 CFR Part 60, Subpart DDD	EX-CONC	MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS LESS THAN 0.10%
PROFINISH	40 CFR Part 60, Subpart DDD	EX-MG/Y	MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS LESS THAN 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN

Unit ID	Regulation	Index Number	Basis of Determination*
			OR EQUAL TO 0.10%
PROFINISH	40 CFR Part 60, Subpart DDD	FLR-CNT	CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3' EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10% 'TABLE 3' CONTROL REQUIREMENTS [NSPS DDD] = CALCULATIONS FROM 'TABLE 3' REQUIRE CONTROLS
PROREACTN	40 CFR Part 60, Subpart DDD	60DDD-2	MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = ON/BEFORE SEPTEMBER 30 1987
PRORECVRY	40 CFR Part 60, Subpart DDD	FLR-CNT	CONTROL OF CONTINUOUS EMISSIONS [NSPS DDD] = ALL CONTINUOUS EMISSIONS ARE CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS CONTROL DEVICE [NSPS DDD] = FLARE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT CONTINUOUS EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 UNCONTROLLED ANNUAL EMISSIONS [NSPS DDD] = UNCONTROLLED ANNUAL EMISSIONS GREATER THAN OR EQUAL TO 1.6 MEGAGRAMS/YEAR (1.76 TONS/YEAR) ANNUAL EMISSIONS ENTERING CONTROL DEVICE [NSPS DDD] = ANNUAL EMISSIONS ENTERING CONTROL DEVICE GREATER THAN OR EQUAL TO CALCULATED THRESHOLD EMISSIONS (CTE) LEVELS CALCULATED IN 'TABLE 3' EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS [NSPS DDD] = WEIGHT PERCENT TOTAL ORGANIC COMPOUNDS GREATER THAN OR EQUAL TO 0.10% 'TABLE 3' CONTROL REQUIREMENTS [NSPS DDD] = CALCULATIONS FROM 'TABLE 3' REQUIRE CONTROLS
PRORECVRY	40 CFR Part 60, Subpart DDD	FLR-INT	EMERGENCY VENT [NSPS DDD] = EMISSIONS ARE NOT AN EMERGENCY VENT STREAM FROM A NEW MODIFIED OR RECONSTRUCTED FACILITY

Unit ID	Regulation	Index Number	Basis of Determination*
			MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE POLYOLEFIN PRODUCTION [NSPS DDD] = NO POLYOLEFIN OR ONLY ONE POLYOLEFIN IS PRODUCED CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS EXISTING CONTROL DEVICE [NSPS DDD] = VENT STREAM IS CONTROLLED IN AN EXISTING CONTROL DEVICE (AS DEFINED IN 40 CFR 60.561) WHICH HAS NOT BEEN RECONSTRUCTED REPLACED OR ITS OPERATING CONDITIONS MODIFIED AS A RESULT OF STATE OR LOCAL REGULATIONS PROCESS EMISSIONS [NSPS DDD] = INDIVIDUAL VENT GAS STREAMS EMIT INTERMITTENT EMISSIONS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = AFTER JANUARY 10 1989 INTERMITTENT CONTROL DEVICE [NSPS DDD] = FLARE EXPERIMENTAL PROCESS LINE [NSPS DDD] = AFFECTED FACILITY IS NOT AN EXPERIMENTAL PROCESS LINE
PRORMPREP	40 CFR Part 60, Subpart DDD	60DDD-1	MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = ON/BEFORE SEPTEMBER 30 1987
PROSTORE	40 CFR Part 60, Subpart DDD	60DDD-4	MANUFACTURED PRODUCT [NSPS DDD] = POLYPROPYLENE OR POLYETHYLENE CONTINUOUS PROCESS [NSPS DDD] = AFFECTED FACILITY PROCESS IS CONTINUOUS CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE [NSPS DDD] = ON/BEFORE SEPTEMBER 30 1987

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 9422	Issuance Date: 01/31/2013
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2003

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data

from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and

3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: PROFINISH	
Control Device ID No.: 580	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart DDD	SOP Index No.: FLR-CNT
Pollutant: VOC/TOC	Main Standard: § 60.562-1(a)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Unit/Group/Process Information	
ID No.: PRORECVRY	
Control Device ID No.: 580	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart DDD	SOP Index No.: FLR-CNT
Pollutant: VOC/TOC	Main Standard: § 60.562-1(a)(1)
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: n/a	
Deviation Limit: No pilot flame.	
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.	

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on **October 22, 2013**.
2. The compliance history review evaluated the period from **November 1, 2007** to **October 22, 2013**.
   Site rating: **0.0, Unclassified** Company rating: **9.49, Satisfactory**
   (High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)
3. Has the permit changed on the basis of the compliance history or site/company rating? .....No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No
2. Is a compliance plan and schedule included in the permit?.....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes

OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes